

EXHIBIT A

Conrad Decl.

**DECLARATION OF CHARLES C. CONRAD IN SUPPORT OF
APPELLEE’S EXPEDITED MOTION TO ABATE DEADLINES OR, IN
THE ALTERNATIVE, MOTION TO STRIKE ISSUES**

I, Charles C. Conrad, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I submit this declaration in support of *Appellee’s Expedited Motion to Abate Deadlines or, in the Alternative, Motion to Strike Issues*.
2. I am a partner at Pillsbury Winthrop Shaw Pittman LLP (“Pillsbury”), counsel to National Bank of Kuwait, S.A.K.P., New York Branch (“NBK”).
3. Attached as **Exhibit 1** is a true and correct copy of Claim No. 14-1 filed by NBK on April 9, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34185 (Bankr. S.D. Tex.). Appended to Claim No. 14-1 are true and correct copies of: (a) a May 23, 2018, loan agreement between Galleria 2425 Owner, LLC and NBK; (b) a May 23, 2018, promissory note by Galleria 2425 Owner, LLC to NBK; and (c) a May 23, 2018 deed of trust by Galleria 2425 Owner, LLC for the benefit of NBK.
4. Attached as **Exhibit 2** is a true and correct copy of the *Memorandum Opinion* confirming NBK’s chapter 11 plan of liquidation entered on June 22, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 565.

5. Attached as **Exhibit 3** is a true and correct copy of the *Order Abating Motion to Convert to Chapter 7 and Appointing Chapter 11 Trustee* entered on January 31, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 99.
6. Attached as **Exhibit 4** is a true and correct copy of the *Chapter 11 Plan of Liquidation of the Debtor by National Bank of Kuwait S.A.K.P., New York Branch* filed on April 10, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 194.
7. Attached as **Exhibit 5** is a true and correct copy of the *Memorandum Order on Fee Application* entered on October 11, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 780.
8. Attached as **Exhibit 6** is a true and correct copy of the *Order Confirming Chapter 11 Plan of Liquidation by National Bank of Kuwait, S.A.K.P. New York Branch* entered on June 22, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 566 (the “Confirmation Order”).
9. Attached as **Exhibit 7** is a true and correct copy of *Notice of Appeal of Order Confirming Plan to District Court* filed on July 7, 2024 in *In re*

Galleria 2425 Owner, LLC, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 603 (the “Confirmation Order Appeal”).

10. Attached as **Exhibit 8** is a true and correct copy of *Appellant’s Statement of the Issues on Appeal and Designation of Record on Appeal* filed on August 9, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 659.
11. Attached as **Exhibit 9** is a true and correct copy of NBK’s *Motion to Dismiss Appeal* filed on August 23, 2024 in *2425 WL, LLC v. National Bank of Kuwait, S.A.K.P., New York Branch*, Case No. 4:24-cv-02590 (S.D. Tex.), ECF No. 3.
12. Attached as **Exhibit 10** is a true and correct copy of 2425 WL, LLC’s *Appellant’s Response in Opposition to Motion to Dismiss Appeal* filed on September 13, 2024 in *2425 WL, LLC v. National Bank of Kuwait, S.A.K.P., New York Branch*, Case No. 4:24-cv-02590 (S.D. Tex.), ECF No. 9.
13. Attached as **Exhibit 11** is a true and correct copy of the *Final Judgment* entered on November 21, 2024 in *2425 WL, LLC v. National Bank of Kuwait, S.A.K.P., New York Branch*, Case No. 4:24-cv-02590 (S.D. Tex.), ECF No. 25 (the “Dismissal Order”).

14. Attached as **Exhibit 12** is a true and correct copy of the transcript of the November 21, 2024, hearing on NBK’s motion to dismiss 2425 WL, LLC’s appeal of the confirmation order as equitably moot filed on January 13, 2025 in *2425 WL, LLC v. National Bank of Kuwait, S.A.K.P., New York Branch*, Case No. 4:24-cv-02590 (S.D. Tex.), ECF No. 32.
15. Attached as **Exhibit 13** is a true and correct copy of 2425 WL, LLC’s *Notice of Appeal* filed on December 5, 2024 in *2425 WL, LLC v. National Bank of Kuwait, S.A.K.P., New York Branch*, Case No. 4:24-cv-02590 (S.D. Tex.), ECF No. 26 (the “Dismissal Order Appeal”).
16. Attached as **Exhibit 14** is a true and correct copy of Claim No. 7-1 filed by 2425 WL, LLC on March 21, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34185 (Bankr. S.D. Tex.) (the “Fraudulent Claim”).
17. Attached as **Exhibit 15** is a true and correct copy of Claim No. 7-2 filed by 2425 WL, LLC on June 28, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34185 (Bankr. S.D. Tex.).
18. Attached as **Exhibit 16** is a true and correct copy of the *Trustee’s Objection to Claim No. 7 of 2425 WL LLC* filed on June 3, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34185 (Bankr. S.D. Tex.),

ECF No. 402. For brevity, the exhibits to the objection have been omitted.

19. Attached as **Exhibit 17** is a true and correct copy of the transcript of the September 6, 2024, hearing on the Trustee's objection to 2425 WL, LLC's Claim No. 7 filed on September 16, 2024, in *In re Galleria 2425 Owner, LLC*, Case No. 23-34185 (Bankr. S.D. Tex.), ECF No. 729.
20. Attached as **Exhibit 18** is a true and correct copy of the *Order Disallowing Proof of Claim and Referral to United States Attorney* entered September 9, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 717 (the "**Fraudulent Claim Order**").
21. Attached as **Exhibit 19** is a true and correct copy of the *Memorandum Opinion* granting NBK's motion to expunge 2425 WL, LLC's lien against the Property entered on December 6, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 870.
22. Attached as **Exhibit 20** is a true and correct copy of the *Order Releasing Deed of Trust Instrument No. RP-2021-258619* entered on December 6, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 872.

23. Attached as **Exhibit 21** is a true and correct copy of 2425 WL, LLC's *Motion for Reconsideration and Relief from Judgment* filed September 23, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 740. For brevity, the exhibits to that motion have been omitted.
24. Attached as **Exhibit 22** is a true and correct copy of the *Order Denying Motion (ECF No. 740)* entered on September 24, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 743.
25. Attached as **Exhibit 23** is a true and correct copy of 2425 WL, LLC's *Notice of Appeal* filed on October 7, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 769 (the "Fraudulent Claim Appeal").
26. Attached as **Exhibit 24** is a true and correct copy of *Appellant's Brief* filed on July 23, 2025 in *2425 WL, LLC v. Christopher Murray, Trustee*, Case No. 4:24-cv-03834 (S.D. Tex.), ECF No. 6.
27. Attached as **Exhibit 25** is a true and correct copy of *Appellee's Opposed Expedited Motion to (I) Abate Appeal; and (II) Strike Issues* filed on June 20, 2025 in *2425 WL, LLC v. National Bank of Kuwait*,

S.A.K.P., New York Branch, Case No. 24-20541 (5th Cir.), ECF No. 42-

1. For brevity, the exhibits to that motion have been omitted.

28. Attached as **Exhibit 26** is a true and correct copy of the *Order* entered on June 23, 2025 in *2425 WL, LLC v. National Bank of Kuwait, S.A.K.P., New York Branch*, Case No. 24-20541 (5th Cir.), ECF No. 49-1.

29. Attached as **Exhibit 27** is a true and correct copy of *National Bank of Kuwait, S.A.K.P., New York Branch's Emergency Motion to Enforce the Gatekeeping Provisions of the Confirmed Chapter 11 Plan* filed on October 2, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 758. For brevity, the exhibits to that motion have been omitted.

30. Attached as **Exhibit 28** is a true and correct copy of the *Supplement to National Bank of Kuwait, S.A.K.P., New York Branch's Emergency Motion to Enforce the Gatekeeping Provisions of the Confirmed Chapter 11 Plan* filed on October 8, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 771.

31. Attached as **Exhibit 29** is a true and correct copy of the *Response of Ali Choudhri to National Bank of Kuwait, S.A.K.P., New York Branch's Emergency Motion to Enforce the Gatekeeping Provisions of the*

Confirmed Chapter 11 Plan filed on October 9, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 775.

32. Attached as **Exhibit 30** is a true and correct copy of the *Agreed Order Granting Emergency Motion to Enforce the Gatekeeping Provisions of the Confirmed Chapter 11 Plan* entered on October 10, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 779 (the “Agreed Gatekeeping Order”).
33. Attached as **Exhibit 31** is a true and correct copy of the *Motion to Comply with Gatekeeping Provisions of the Confirmed Chapter 11 Plan* filed on November 4, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 810 (“Choudhri’s Motion to Comply”). For brevity, the exhibits to that motion have been omitted.
34. Attached as **Exhibit 32** is a true and correct copy of the *Order Denying Motion (ECF 810)* entered on November 25, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.), ECF No. 833 (the “Order Denying Choudhri’s Motion to Comply”).
35. Attached as **Exhibit 33** is a true and correct copy of the *Amended Order Granting Turnover, Charging Order and Appointment of Receiver*

Against Judgment Debtor entered on April 9, 2025 in *Mokaram-Latif West Loop, Ltd. and Osama Abdullatif v. Ali Choudhri*, Cause No. 2012-27197-A (333rd Jud. Dist. Ct. Harris Cty.).

36. Attached as **Exhibit 34** is a true and correct copy of the *Notice of Appeal* filed on April 29, 2025 in *Mokaram-Latif West Loop, Ltd. and Osama Abdullatif v. Ali Choudhri*, Cause No. 2012-27197-A (333rd Jud. Dist. Ct. Harris Cty.).
37. Attached as **Exhibit 35** is a true and correct copy of the transcript of the hearing on confirmation of the chapter 11 plan of liquidation held on June 19, 2024 in *In re Galleria 2425 Owner, LLC*, Case No. 23-34815 (Bankr. S.D. Tex.).
38. Attached as **Exhibit 36** is a true and correct copy of the *Memorandum Opinion* issued on July 17, 2025 in *Naissance Galleria, LLC v. Azeemeh Zaheer*, Case No. 01-23-00727-CV (Tex. App.—Houston [1st Dist.]).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Signed: August 1, 2025
Houston, Texas

/s/ Charles C. Conrad
Charles C. Conrad
Pillsbury Winthrop Shaw Pittman LLP